

EXHIBIT F

Dennis Giuffre - October 29, 2020

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1 2016?

2 A. I am aware that there was a previous
3 lawsuit, yes, sir.

4 Q. Were you aware that the 2016 lawsuit
5 involved the '467 patent?

6 A. Well, maybe I should say I assumed
7 that that was so, yes, sir.

8 Q. What did you assume with respect to
9 the products that were at issue in this case in
10 connection with the products that were at
11 issue -- or are at issue in the present case?

12 MR. CULBERTSON: Object to the
13 form.

14 THE WITNESS: I think -- by
15 "products" -- or my understanding of what
16 that would mean would be the HTC
17 smartphones in the -- specifically, the
18 models One M7, One M8, and One M9 that
19 have been alleged by Salazar as infringing
20 the '467 patent.

21 BY MR. GILLAM:

22 Q. Right. Do you assume that those were
23 at issue in the other case and are at issue in
24 this case as well?

25 A. That's what I think, yes, sir.

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1 (Reporter clarification)

2 THE WITNESS: I don't know of
3 anything else that it would have involved
4 in the other case.

5 BY MR. GILLAM:

6 Q. Did you read any of the transcripts
7 from that trial? I'm just talking about the
8 case in 2016, the 2016 case between Salazar and
9 HTC.

10 A. No, sir.

11 Q. Did you ask what the outcome of that
12 trial was?

13 A. I've never asked.

14 Q. Do you know what the outcome of that
15 trial was?

16 A. I don't know with certainty. I can
17 just make an assumption, though, that
18 Mr. Salazar did not prevail, but I don't know
19 with certainty any details about it.

20 Q. Do you know who Mr. Salazar's damages
21 expert was in that case?

22 A. I may have heard his name, but I do
23 not recollect it. I did not know him.

24 Q. Mr. Blok? Do you recognize that
25 name, Mr. Blok?

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1 A. I may have heard that, yes, sir.

2 Q. Did you understand that he gave a
3 damages report in that case?

4 A. Well, I would certainly think that he
5 did, yes, sir.

6 Q. Did you ask to review that in
7 connection with your case?

8 A. I did not.

9 Q. Why not?

10 A. I prefer to start from scratch with
11 my own work, sir.

12 Q. Would that have provided any useful
13 information to you? Or do you think that's
14 something that you should not have reviewed in
15 connection with the work you did here?

16 MR. CULBERTSON: Object to the
17 form.

18 THE WITNESS: Well, the only
19 thing that I am aware of is having been
20 told by what, I assume, was in this expert
21 report has been passed on to me by
22 Mr. Keyhani, that a particular device, I
23 believe called the Pronto, and then
24 another device, I believe called the
25 Harmony. But that's all that I knew of

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1 that was, I believe, contained within that
2 report.

3 BY MR. GILLAM:

4 Q. Now, you understand that the
5 defendants' expert in that case was
6 Mr. Bakewell? By that case, I'm talking about
7 the previous case between Salazar and HTC.

8 A. That's my understanding, yes, sir.

9 Q. Did you review the data --

10 A. I've seen -- I'm sorry.

11 I've seen the rebuttal report to
12 my report in this case, and it is coauthored,
13 though.

14 Q. Yes, sir. Did you request the
15 damages report authored by Mr. Bakewell in
16 Salazar v. HTC case back in 2016?

17 MR. CULBERTSON: I'm going to
18 object. That's a communication that's
19 protected by the work product doctrine.

20 THE WITNESS: I'm sorry.

21 BY MR. GILLAM:

22 Q. Have you seen the Bakewell report in
23 Salazar v. HTC case in 2016?

24 A. No, I have not.

25 Q. Is there anything about the 2016 case

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1 between Salazar and HTC that you would like to
2 know which might impact your opinions in this
3 case?

4 MR. CULBERTSON: Object to the
5 form.

6 THE WITNESS: If there is, I'm
7 not aware of it. I mean, there could be
8 something that would have been a benefit,
9 but I -- or may have had some relationship
10 to my opinions, but I'm not aware of
11 anything.

12 BY MR. GILLAM:

13 Q. But nothing from that case has been
14 provided to you? No documents, no reports, or
15 anything like that; is that correct?

16 A. As I said earlier, just the
17 information provided to me by word of mouth
18 from Mr. Keyhani.

19 Q. But insofar as any documents or
20 reports or writings of any kind, am I correct
21 that none of that has been provided to you?

22 MR. CULBERTSON: Objection.

23 THE WITNESS: That's my
24 understanding, yes.

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